| REFORE THE   | STATE OF SO   | OUTH CAROLIN   | $\mathbf{A}$                 |                           |               |   |  |
|--|---|--|------------------------------|---------------------------|---------------|---|--|
| Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs    DOCKET   Date: 15-0.6   | In the Matter of:  Application of Duke Energy Carolinas,  LLC for Approval of Energy Efficiency |  |                              | OF SOUTH CAROLINA Pested: |               |   |  |
| DOCKET   NUMBER: 2007 - 3581x E   SOC  |   |  |                              | COVE                      | KSHEET        | Dept: SA  |  |
| NUMBER: 2007 - 35&ix E   S   S   | and Portfolio of Energy Efficiency Programs   |  | lency Rider ) 1cv Programs ) | DOCKET                    | ]             | Date: 1-508   |  |
| Please type or print)   Submitted by: J. Blanding Holman, IV   |   |  | )                            |                           |               | -7  |  |
| Submitted by:    Address:   Southern Environmental Law Center   Telephone:   (919)967-1450   | _   |  | )                            |                           |               | Addition of the second of the |  |
| Sc Bar Number:   72260   |   | *)   |                              |                           |               |   |  |
| Southern Environmental Law Center   Telephone:   (919)967-1450   | •   | The state of the s |                              |                           | 72260         |   |  |
| 200 W. Franklin Street, Suite 330 Fax:   | Address:  |  | nmental Law Center           | TD 1                      |               | 150   |  |
| Chapel Hill, NC 27516   Email: BHolman@SELCNC.org  |   |  |                              |                           |               |   |  |
| Bectric/Gas   Agreement   Memorandum   Request for Certificatio   Electric/Vater   Appellate Review   Objection   Resale Agreement   Electric/Water/Sewer   Brief   Petition for Reconsideration   Response to Discovery   Sewer   Comments   Petition for Rule to Show Cause   Response to Discovery   Sewer   Complaint   Petition to Intervene Out of Time   Stipulation   Transportation   Discovery   Prefiled Testimony   Subpoena   Matter   Interconnection Agreement   Interconnection Agreement   Protest   Disters Affidavit   Protest   Disters Affidavit   Protest   Traitf   Disters Affidavit   Protest   Disters Affidavit   Protest   Disters Affidavit   Protest   Disters Affidavit   Protest   Disters Affidavit   Disters Affidav |   | Chapel Hill, NC  | 27516                        | Other:                    | ()-           |   |  |
| DOCKETING INFORMATION (Check all that apply)    Emergency Relief demanded in petition   Request for item to be placed on Commission's Agenda expeditiously    Other:   | NOTE: The cover sheet and information   |  |                              | Email: BHolman            | @SELCNC.or    | g   |  |
| Electric   Affidavit   Letter   Request     Electric/Gas   Agreement   Memorandum   Request for Certificatio     Electric/Telecommunications   Answer   Motion   Request for Investigation     Electric/Water   Appellate Review   Objection   Resale Agreement     Electric/Water/Telecom.   Application   Petition   Resole Amendment     Electric/Water/Sewer   Brief   Petition for Reconsideration   Reservation Letter     Gas   Certificate   Petition for Rulemaking   Response     Railroad   Comments   Petition for Rule to Show Cause   Response to Discovery     Sewer   Complaint   Petition to Intervene   Return to Petition     Telecommunications   Consent Order   Petition to Intervene Out of Time   Stipulation     Transportation   Discovery   Prefiled Testimony   Subpoena     Water   Exhibit   Promotion   Tariff     Water/Sewer   Expedited Consideration   Proposed Order   Other:     Administrative Matter   Interconnection Agreement   Protest     Other:   Interconnection Amendment   Publisher's Affidavit   | Other:  |  |                              |                           |               |   |  |
| Electric/Gas   | ⊠ Electric  |  |                              | - Terron                  | Check all tha | at apply)<br>   |  |
| Electric/Telecommunications   Answer   Motion   Request for Certification   Electric/Water   Appellate Review   Objection   Resale Agreement   Electric/Water/Telecom   Application   Petition   Resale Amendment   Electric/Water/Sewer   Brief   Petition for Reconsideration   Reservation Letter   Petition for Reconsideration   Reservation Letter   Petition for Rulemaking   Response     | ☐ Electric/Gas  |  |                              |                           |               | Request   |  |
| Electric/Water   | ☐ Electric/Telecom  | nmunications   |                              |                           |               | Request for Certificatio  |  |
| Electric/Water/Telecom.   Application   Petition   Resale Agreement     Electric/Water/Sewer   Brief   Petition for Reconsideration   Reservation Letter     Gas   Certificate   Petition for Rulemaking   Response     Railroad   Comments   Petition for Rule to Show Cause   Response to Discovery     Sewer   Complaint   Petition to Intervene   Return to Petition     Telecommunications   Consent Order   Petition to Intervene Out of Time   Stipulation     Transportation   Discovery   Prefiled Testimony   Subpoena     Water   Expedited Consideration   Proposed Order   Other:     Administrative Matter   Interconnection Agreement   Protest     Other:   Interconnection Amendment   Publisher's Affidavit  | _   |  |                              |                           |               | Request for Investigation   |  |
| Electric/Water/Sewer   | ☐ Electric/Water/T  | elecom.  |                              |                           |               | <del>-</del> .  |  |
| Gas   Certificate   Petition for Rulemaking   Response     Railroad   Comments   Petition for Rule to Show Cause   Response to Discovery     Sewer   Complaint   Petition to Intervene   Return to Petition     Telecommunications   Consent Order   Petition to Intervene Out of Time   Stipulation     Transportation   Discovery   Prefiled Testimony   Subpoena     Water   Exhibit   Promotion   Tariff     Water/Sewer   Expedited Consideration   Proposed Order   Other:     Administrative Matter   Interconnection Agreement   Protest     Other:   Interconnection Amendment   Publisher's Affidavit  | ☐ Electric/Water/Se   | ewer   |                              |                           |               |   |  |
| Railroad Comments Petition for Rule to Show Cause Response to Discovery  Sewer Complaint Petition to Intervene Return to Petition  Telecommunications Consent Order Petition to Intervene Out of Time Stipulation  Transportation Discovery Prefiled Testimony Subpoena  Water Exhibit Promotion Tariff  Water/Sewer Expedited Consideration Proposed Order Other:  Administrative Matter Interconnection Agreement Protest  Other: Interconnection Amendment Publisher's Affidavit  | Gas   |  |                              |                           |               | Reservation Letter  |  |
| Sewer Complaint Petition to Intervene Response to Discovery  Telecommunications Consent Order Petition to Intervene Out of Time Stipulation  Transportation Discovery Prefiled Testimony Subpoena  Water Exhibit Promotion Tariff  Water/Sewer Expedited Consideration Proposed Order Other:  Administrative Matter Interconnection Agreement Protest  Other: Publisher's Affidavit  | Railroad  |  |                              | _                         | · ·           |   |  |
| ☐ Telecommunications       ☐ Consent Order       ☐ Petition to Intervene Out of Time       ☐ Stipulation         ☐ Transportation       ☐ Discovery       ☐ Prefiled Testimony       ☐ Subpoena         ☐ Water       ☐ Exhibit       ☐ Promotion       ☐ Tariff         ☐ Water/Sewer       ☐ Expedited Consideration       ☐ Proposed Order       ☐ Other:         ☐ Administrative Matter       ☐ Interconnection Agreement       ☐ Protest         ☐ Other:       ☐ Interconnection Amendment       ☐ Publisher's Affidavit  | Sewer   |  |                              |                           |               |   |  |
| ☐ Transportation       ☑ Discovery       ☐ Prefiled Testimony       ☐ Stipulation         ☐ Water       ☐ Exhibit       ☐ Promotion       ☐ Tariff         ☐ Water/Sewer       ☐ Expedited Consideration       ☐ Proposed Order       ☐ Other:         ☐ Administrative Matter       ☐ Interconnection Agreement       ☐ Protest         ☐ Other:       ☐ Interconnection Amendment       ☐ Publisher's Affidavit  | Telecommunicati   | ons  | •                            |                           |               | Return to Petition  |  |
| Water  | ☐ Transportation  |  |                              |                           |               | ☐ Stipulation   |  |
| Water/Sewer  | ☐ Water   |  |                              |                           | ony           | Subpoena  |  |
| Administrative Matter  Interconnection Agreement  Protest  Interconnection Amendment  Publisher's Affidavit  | ☐ Water/Sewer   |  |                              |                           |               |   |  |
| Other: Publisher's Affidavit   | Administrative M  | atter  |                              |                           |               | Other:  |  |
| The Property of Authority Africant   | Other:  |  |                              |                           | 1 - 2.        |   |  |
|  |   |  |                              |                           | lavit         |   |  |

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## SOUTHERN ENVIRONMENTAL LAW CENTER

200 WEST FRANKLIN STREET, SUITE 330 CHAPEL HILL, NC 27516-2559

Telephone 919-967-1450 Facsimile 919-929-9421 selcnc@selcnc.org Charlottesville, VA Chapel Hill, NC Atlanta, GA Asheville, NC Sewanee, TN

February 4, 2007

VIA HAND DELIVERY

Mr. Charles L.A. Terreni Chief Clerk of the Commission S.C. Public Service Commission P.O. Drawer 11649 Columbia, SC 29211

RE: Application of Duke Energy Carolinas, LLC (Docket No. 2007-358 C

RECEIVED

Dear Mr. Terreni:

Enclosed please find for filing in the above-captioned docket the original and two copies of the Response of the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy and the Southern Environmental Law Center to Duke Energy Carolinas, LLC's ("Duke") First Data Request. Please note that the enclosed compact disc contains data claimed confidential by Duke, and should be filed under seal. We are providing the confidential enclosure to counsel for Duke today. By copy of this letter, I am serving all parties of record with this Response via electronic mail and U.S. Mail. Please date-stamp the extra copy as proof of filing and return it with our courier. If you have questions, please do not hesitate to contact me.

Sincerely,

Gudrun Thompson

**Enclosures** 

Cc: Catherine E. Heigel (via Email and U.S. Mail w/ conf. encl.)
Lawrence B. Somers (via Email and U.S. Mail w/ conf. encl.)
Frank R. Ellerbe, III (via Email and Hand Delivery w/ conf. encl.)
Bonnie D. Shealy (via Email and Hand Delivery w/ conf. encl.)
Scott Elliott (via Email and U.S. Mail w/o conf. encl.)
James H. Jeffries (via Email and U.S. Mail w/o conf. encl.)
Jeremy Hodges (via Email and U.S. Mail w/o conf. encl.)
Nanette S. Edwards (via Email and U.S. Mail w/o conf. encl.)
Robert E. Tyson Jr. (via Email and U.S. Mail w/o conf. encl.)
Alan Jenkins (via Email and U.S. Mail w/o conf. encl.)

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PSC SC DOCKETING DEPT.